

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

VALDEMARAS CEINORIUS,)	
VITALIJ CHRISONOPULO,)	
FIODOR IGNATOV,)	
VIKTOR KUZNCOV,)	
ANATOLIJ MATVEJEV,)	
NIKOLAJ NIKULIN,)	
VALERIJ POTAPOV, and)	
VLADIMIR ULJANOV,)	
Plaintiffs)	
V.)	Civil Action
ARTHUR FRANCO and)	No. 03-CV-12270-RWZ
JOHN G. HADAYIA,)	
Defendants)	
)	

AFFIDAVIT OF VIKTOR KUZNCOV

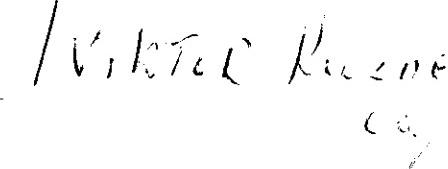
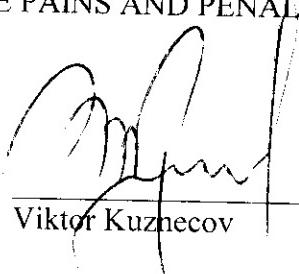
1. I am Viktor Kuznecov, Taikos pr. 99-27, Klaipeda, Lithuania.
2. From May 22, 2002 to September 24, 2002, I was a member of the crew of the Tug SEA GIANT.
3. I was not paid all of my wages for my service on the Tug SEA GIANT.
4. I am still owed \$13,399.00 in wages.
5. At the end of my service on the Tug SEA GIANT, the Defendant John G. Hadayia, on behalf of the vessel, signed and gave me a Guarantee Letter in which he, on behalf of the vessel, acknowledged this debt.
6. The original of this Guarantee Letter is attached as Exhibit A to this Affidavit.

SUBSCRIBED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY

21st May, 2004

Date

Viktor Kuznecov



AFFIDAVIT OF INTERPRETER

I certify that this affidavit was signed in my presence, that I correctly and accurately translated this affidavit from English into Russian, and that Viktor Kuznecov acknowledged that he fully understood its contents and meaning.

SUBSCRIBED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY

21st May, 2004

21 May 2004
Date

Liudvika Urbonavičiutė
Interpreter – Ms. Liudvika Urbonavičiutė
H. Manto str. 1, LT-5801 Klaipeda, Lithuania